

EXHIBIT “A”



AMY N. WILLIAMSON
ATTORNEY AT LAW

September 5, 2022

VIA EMAIL

bwebb@cozzalaw.com

Benjamin D. Webb
Cozza Law Group PLLC
400 Holiday Drive, Ste 210
Pittsburgh, PA 15220

Re: *Renee Zinsky vs. Michael Russin et. al*

2:22-cv-00547-MJH

For Settlement Purposes Only Pursuant to Fed.R.Civ.P. 408

Dear Ben:

Please allow this correspondence to follow up on our conference with Judge Horan on September 1st. Judge Horan stated, in no uncertain terms, that it would be in your client's best interest to make a good faith attempt to resolve this matter at this time. More specifically, Judge Horan stated that, based on her review of this case, she was "***appalled***" by your client's conduct and couldn't "***believe that anyone could be so brash***" given his ongoing exposure in this case. She went on to explain that Mr. Russin continues to "***shoot himself in the foot***" which "***makes the Plaintiff's case for her***". Judge Horan went so far as to state that if Mr. Russin does not settle this matter near term, he will have "***more problems than this lawsuit***" and risks "***extensive exposure with significant damages***" going forward. The Judge asked you to "***get your client under control***" and declared that his behavior "***would not be tolerated***" by the Court.

For those reasons, Judge Horan stated that she would not be mandating ADR at this time. Instead, the Court recommended that Plaintiff provide a settlement demand to all of the Defendants in this case. I have copied counsel for the other Defendants hereto.

Before addressing Plaintiff's demand, I would like to take this opportunity to elaborate on Judge

Horan's concerns with regard to Mr. Russin's ongoing conduct. Incredibly, *within two days following the Court's comments and instructions*, Mr. Russin continued to conduct himself in the same reprehensible manner. For example, on September 3, 2022, Mr. Russin published a podcast titled *How to Be a Closer, Fuel for the Fire, and False Gospel Preachers*. At that time, Mr. Russin made a variety of statements (presumably related to closing sales) in a brash, appalling, and aggressive manner to include the following:

- *I've always been a closer. I'm not tooting my own horn. It's just a fact ... It doesn't matter what it is ... closing in business and in life are the same. Everything in life is closing ... If you're a man ... you got to close a woman.*
- *Closing is such an essential skill in life... You can't be a dog, especially as a man and not know how to close.*
- *At the end of the day, whoever it is, a woman, bank teller, loan officer, girl across from you at the bar... the first thing they are buying is you ... People are animals.*
- *I got a guy that works at one of my organizations ... This guy can smell when women are ovulating.*
- *I can tell you right now, there's no human being on this planet that can take me out of the game ... when they see you go through massive amounts of adversity and still come out on top, they want to drag you right down into the pit ... they have such low self-worth that they can't stand to see people win ... They don't have the balls to go out and win ... You gotta grab and pull him back down ... in this bucket of misery and shit with us.*
- *So when someone else becomes so focused on you that they want to take you out of the game and you just keep going out and working and winning... like our recruiting company just had its biggest week ever ... we built a million dollar a year business within 6 months.*
- *Keep denting me, go ahead... bounce me around, beat me up I love it. I have a sick relationship with pain. It makes me so much better... Thank you haters! Haters make me greater!*
- *But you don't want to hyper fixate on that ... Then you start feeding your dark side too much... That's when you want to lash out. That's when you do something that you shouldn't do.*
- *You can't jeopardize the rest of your life over a hater... You go to jail for felonious assault.*
- *I'm not strong enough. I'm not good enough. We are all inherently wicked.*
- *It's not that I'm not good enough. I'm not good all.*
- *I've struggled with this a lot in the past couple of months... I feel worse now than I ever have in my life ... I am more convicted and disgusted with myself now than I have ever been in my entire existence on this planet.*
- *The process of sanctification ... it never ends ... Because when you remove the big sins, you just become aware of the medium ones... Like ... I'm not having sex with a bunch of people or doing drugs ... or cheating on my wife ... Then you become violently aware of the small things ... You should feel worse than you ever have in your life ... you should be remorseful.*
- *Please donate. Please help us.*

Similarly, on the same day (September 3, 2022), Mr. Russin posted a photograph of himself with the caption "***War Ready***" on social media. Of course, these statements are no different than Mr. Russin's other public statements such as "***Money Grubbing Whores***" (referencing women who claim sexual assault

and sexual harassment), “*I do everything fast, even cummies*”, or “*Vax this Dick*” but they are even more shocking and remarkable given the timing, i.e. days following Judge Horan’s clear and direct reprimand of said conduct.

There are multiple witnesses who will testify that these types of comments are, and continue to be, typical for Mr. Russin in the AIL office and at other AIL work settings for years, including the past 6 months. The witnesses will testify that Mr. Russin’s recent comments are often followed by even more brash statements such as “*What are you going to do about it, fire me?*” As you may know, Mr. Russin has voluntarily published the same statements over the past six (6) months in other capacities.

These are merely the “highlights” of Mr. Russin’s most recent brash and appalling conduct. As you know from Plaintiff’s Amended Complaint, there are droves of similar vulgar, misogynistic, aggressive, and violent comments and conduct on behalf of Mr. Russin in his capacity as an agent of AIL and Arias Agencies over the years. Although Mr. Russin’s conduct is perhaps the most vile and egregious that I am aware of, make no mistake... there are just as many examples of other male agents’ depraved conduct that will be evidence of the toxic and hostile work environment which Defendants have subjected Plaintiff to over the past 3.5 years. Of course, the extensive list of witnesses (including Mr. Russin’s wife, Geneva Russin), documents, texts, photographs, videos, and other evidence will be shared over the course of discovery near term.

As you may know, AIL acknowledged Mr. Russin’s appalling conduct by allegedly attempting to terminate his contract on or about February 2022. AIL’s counsel referred to the alleged termination as a “remedial measure” resulting from AIL’s investigation of Plaintiff’s claims of sexual harassment. Yet, unbelievably, Mr. Russin continues to work on behalf of AIL through present. Mr. Russin performs professional services on behalf of AIL, receives income from AIL, works out of the same AIL office¹, manages and attends AIL meetings, and continues to manage the same team of AIL agents as he did prior to his alleged termination. Typically, I would assume that you are already aware of these facts. Given your recent inquiries about Mr. Russin’s conduct², however, I wanted to be sure to clarify any such confusion with all defense counsel. Defendants’ ongoing inability to provide Plaintiff with a safe working environment was clearly reflected by Judge Horan’s concerned comments about the “*escalating*” nature of Defendants’ exposure.

Whether Defendants refer to Mr. Russin as a “consultant”, “contractor”, or otherwise, it is of no matter since he continues to function as an agent on behalf of the Defendants, and in a leadership role at that ... just as he did during his daily drug and alcohol abuse, just as he did during countless episodes of sexual harassment, just as he did during his felonious criminal charges and convictions, and just as he did during an involuntary commitment to a mental health facility. All of which occurred publicly while Mr. Russin was hired, employed, retained, and celebrated as a high-ranking leader by Simon Arias and AIL.

Based on Plaintiff’s employment experience alone, Defendants’ inability to provide a safe work environment was not a mere oversight, but rather a choice. Perhaps the most blatant example is that nothing has actually changed since AIL admitted to Mr. Russin sexually harassing Plaintiff and then

¹ AIL and/or Arias Agencies’ Portland, Maine office.

² Contrary to your representations, this there is a significant amount of evidence to support Plaintiff’s claims that Mr. Russin’s private conduct is just as vile and offensive as his public “persona”.

misrepresenting Mr. Russin's termination as a "remedial measure". Similarly, Plaintiff's complaints of sexual harassment and insurance fraud were concealed by Defendants for at least four months after being reported to Simon Arias. And, for an additional five months, Globe Life and AIL continued to recognize Mr. Russin and Mr. Arias with "leadership" awards and generous incomes ... all the while Plaintiff was traumatized and completely unable to work. What is more, Globe Life and the Defendants never even bothered to interview Plaintiff in connection with the alleged investigation of her documented reports of insurance fraud. What is more, that doesn't even address the experiences of numerous other witnesses who will testify to eerily similar experiences while working for the Defendants.

[REDACTED] (the [REDACTED] m, [REDACTED] \$5 [REDACTED]
(C) [REDACTED] all [REDACTED] f [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
(D) [REDACTED] s [REDACTED] fee [REDACTED] is [REDACTED]
(E) [REDACTED] or [REDACTED]
to [REDACTED] if [REDACTED] is the [REDACTED] on [REDACTED] of [REDACTED] \$ [REDACTED]
[REDACTED] [REDACTED] be [REDACTED] ton [REDACTED] to [REDACTED] e [REDACTED]
[REDACTED]
(II) [REDACTED]
[REDACTED] \$ [REDACTED] e [REDACTED]
[REDACTED] \$ [REDACTED] inc [REDACTED] e [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] at [REDACTED]
[REDACTED]

Please feel free to reach out should you have any questions or concerns. Otherwise, I look forward to hearing from you once you have an opportunity to confer with your client(s).

Sincerely,

/s/ Amy N. Williamson

cc: Jean Novak, Esq. (on behalf of Simon Arias III, S.A. Holdings, LLC, and Arias Agencies)
Anne Dana, Esq. (on behalf of American Income Life Insurance Company)

EXHIBIT "B"



Amy Williamson <awilliamson@awilliamsonlaw.com>

Mr. Russins ongoing conduct and exposure

3 messages

Amy Williamson <awilliamson@awilliamsonlaw.com>
To: Benjamin Webb <bwebb@cozzalaw.com>

Thu, Dec 22, 2022 at 11:06 PM

Hi Ben,

As you know, ever since my client filed suit, Mr. Russin continues to publish threats and use intimidation tactics against her. I have cited to some of them in court pleadings. In response, Judge Horan admonished Mr. Russin and you directly, warning you that he is creating exponential exposure for himself as a result. In fact, she stated that this civil case would be the least of his concerns if he continues his "brash" and "appalling" conduct. What is more, Judge Horan has only seen a small fraction of your client's conduct. Yet, Mr. Russin remains as brash and appalling as ever.

Yesterday, you asked me for an extension of time to produce Mr. Russins discovery responses to include responses to RFPD, interrogatories and RFA. Appreciating the potential volume of information and documents, I agreed to an extension with a new deadline of tomorrow, 12/23.

Ironically enough, tonight Mr. Russin posted the attached photo and message on his instagram page. You will see that he states that his cigar is for a "dear old friend... getting a big batch of presents tomorrow."

I am sure you will continue to take the position that these posts are not about my client but rather another "dear friend" or some other nonsense. When you take a step back and take a look at the timing of all of these posts in conjunction with the developments in the litigation and my clients claims, I feel confident that any juror (let alone Judge Horan) will see right through those defenses.

I will be meeting with my client over the holidays to discuss next steps but out of respect for you, I wanted to give you a heads up that your client's appalling conduct is creating ongoing exposure for him on many levels.

Thanks,
Amy

10:42



absideon_achievement 6h
❖ afternoon surf by elisespresets >

...



This cigar is for a dear old friend

Who's getting a big batch of presents tomorrow from Santa

It's going to take the whole weekend to soak it all in ❤️

EXHIBIT “C”



Planet Depos®
We Make It Happen™

Transcript of Reneé Margaret Zinsky

Date: January 13, 2023
Case: Zinsky -v- Russin, et al.

Planet Depos
Phone: 888-433-3767
Fax: 888-503-3767
Email: transcripts@planetdepos.com
www.planetdepos.com

Transcript of Renée Margaret Zinsky

1 (1 to 4)

January 13, 2023

1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE WESTERN DISTRICT OF PENNSYLVANIA 3 - - - - - x 4 RENEE ZINSKY, : 5 Plaintiff, : 6 v. : Civil Action No. 7 MICHAEL RUSSIN, RUSSIN : 2:22-cv-547 8 FINANCIAL, RUSSIN GROUP, : 9 SIMON ARIAS, III, ARIAS : 10 AGENCIES, S.A. ARIAS : 11 HOLDINGS, LLC, AMERICAN : 12 INCOME LIFE INSURANCE : 13 COMPANY, : 14 Defendants. : 15 - - - - - x 16 17 Deposition of RENEÉ MARGARET ZINSKY 18 Pittsburgh, Pennsylvania 19 Friday, January 13, 2023 20 9:22 a.m. 21 22 23 Job No.: 476914 24 Pages: 1 - 168 25 Reported By: Amelia Bowlen, FAPR, RDR, CRR, CRC	1 A P P E A R A N C E S 2 ON BEHALF OF THE PLAINTIFF: 3 AMY N. WILLIAMSON, ESQUIRE 4 WILLIAMSON LAW LLC 5 Law and Finance Building 6 429 Fourth Avenue, Suite 300 7 Pittsburgh, Pennsylvania 15219 8 (412)932-2744 9 10 ON BEHALF OF THE DEFENDANTS: 11 BENJAMIN D. WEBB, ESQUIRE 12 ROCCO E. COZZA, ESQUIRE 13 COZZA LAW GROUP PLLC 14 400 Holiday Drive 15 Suite 210 16 Pittsburgh, Pennsylvania 1220 17 (412)790-2789 18 19 20 21 22 23 24 25
	2 C O N T E N T S 3 EXAMINATION OF RENEÉ MARGARET ZINSKY PAGE 4 By Mr. Webb 5 5 6 TIME ON THE RECORD: 3 hours 8 minutes 7 8 E X H I B I T S 9 (Attached to transcript.) 10 NUMBER PAGE 11 Exhibit 1 Text messages: Russin00139, 44 12 00140, 00142, 00143, 00144, 13 00145, 00149, 00151, 00152, 14 00154, 00156, 00157, 00161, 15 00163, 00170, 00172, 00177, 16 00178, 00189 17 Exhibit 2 Messages, Russin00102 - 00103 58 18 Exhibit 3 Video 115 19 Exhibit 4 Russin00012 - 00013 129 20 Exhibit 5 Zinsky00001 132 21 Exhibit 6 Video, Russin00052 135 22 Exhibit 7 Video, Russin00048 23 Exhibit 8 Video, Russin00051 140 24 Exhibit 9 Video, Russin00055 143 25

Transcript of Reneé Margaret Zinsky

29 (113 to 116)

January 13, 2023

	113		115
1	say you don't know.	1	A Okay.
2	A No, I don't know. I don't know.	2	Q I'm just going to pull it up.
3	Q Did you have lunch?	3	MR. WEBB: These were videos that I think
4	A Yeah, probably, yeah.	4	you provided us during initial disclosures, Amy,
5	Q Do you know what you had for lunch?	5	just for your knowledge.
6	A Probably either Taco Bell or Jersey Mike's	6	(Zinsky Deposition Exhibit 3 was marked
7	or Jimmy John's. You know, those are the local	7	for identification and is attached to the
8	places we always ordered from.	8	transcript.)
9	Q Did you report this incident to the	9	Q Is this from the date of that incident,
10	police?	10	10 this video? I don't think there's any sound with
11	A No, like I wanted to -- I wanted to keep	11	11 this, but I'll turn it up anyway.
12	my job.	12	(Video playing.)
13	Q Did you treat at the hospital for this	13	A Maybe, maybe.
14	incident?	14	Q Do you know who took that video?
15	A On the -- like two days after, I think, a	15	A It might have been one of my friends,
16	day or two after, I went to the hospital, yes,	16	Matt, slash colleague.
17	because I still was not feeling okay.	17	Q Who is Matt?
18	Q Did they run tests?	18	A Matt Mamros, he was another colleague of
19	A I believe so.	19	mine.
20	MS. WILLIAMSON: If you know. If you don't	20	Q How do you spell the last name?
21	know, that's fine.	21	A M-a-m-r-o-s.
22	A I don't know for sure.	22	Q Okay. Why would he have taken you to the
23	Q Which hospital was it?	23	hospital?
24	A UPMC Passavant.	24	A Because I think we were riding out
25	Q Was there a tox report done, toxicology	25	together to go to appointments, and I told him I
	114		116
1	report?	1	I didn't feel good so we -- like I still wasn't
2	A I don't know.	2	feeling good and I was not okay, and he said,
3	MR. WEBB: I assume that would be in the	3	let's go to the hospital. So he came with me
4	UPMC records once we're able to get them.	4	because he was already in my car.
5	MS. WILLIAMSON: I mean, I don't -- yeah.	5	Q Did anyone tell you that Mike administered
6	MR. WEBB: I still don't have those	6	GHB to you in March 2020?
7	authorizations, by the way.	7	A No.
8	MS. WILLIAMSON: I was actually going to do	8	MR. COZZA: And this hospital visit was two
9	them here, but we'll get them to you either -- the	9	days after the incident you're claiming, correct?
10	signed verification and authorizations.	10	THE WITNESS: A day or two. I don't know
11	MR. WEBB: I can print and you can sign them	11	for sure. It was within a day or two.
12	if that works.	12	MR. WEBB: I just want to see if I have any
13	THE WITNESS: That's fine.	13	more related to the car rides and then we can take
14	MS. WILLIAMSON: We can do them here. It	14	like a 15-minute break, Amy, if that's okay with
15	doesn't matter, but I haven't seen them, to answer	15	you.
16	your question.	16	MS. WILLIAMSON: I'm sorry. I thought you
17	BY MR. WEBB:	17	were asking her, yeah.
18	Q To your knowledge, what were you diagnosed	18	MR. WEBB: Okay.
19	with?	19	MS. WILLIAMSON: Whatever you want to do,
20	A I wasn't really -- I don't even think -- I	20	Reneé. I mean, unless if it's easier for you to
21	don't know if I was diagnosed with anything. They	21	keep going, then we can keep going.
22	gave me fluids, and I don't know.	22	MR. WEBB: I kind of just need a quick break
23	Q I'm going to show you a video. I just	23	to just go and get refreshed, if that's okay. We'll
24	want you to tell me whether this is from that	24	be quick.
25	hospital visit.	25	MR. COZZA: I believe in your Complaint you

EXHIBIT "D"

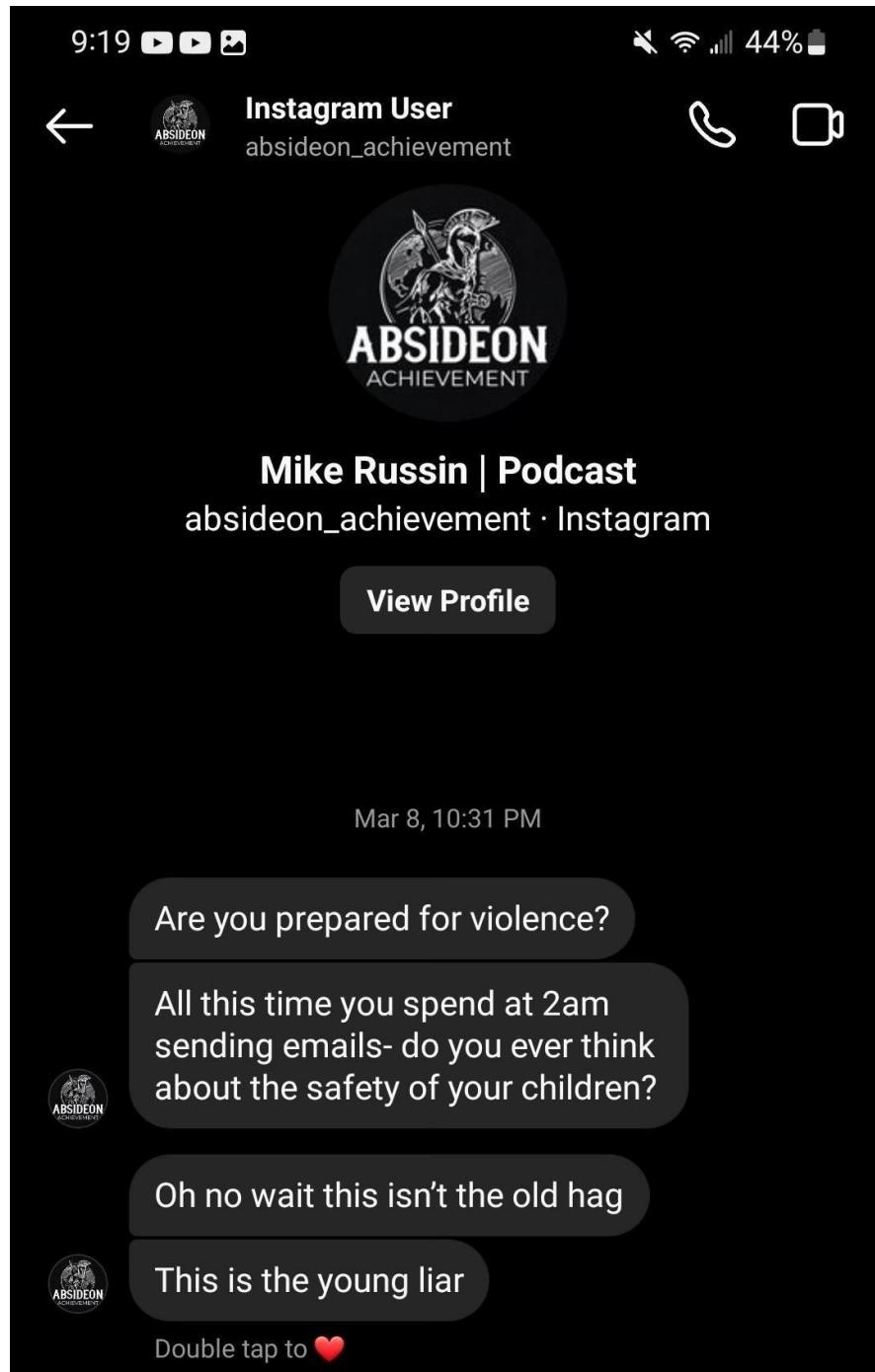


EXHIBIT “E”

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,
Plaintiff,
v.

Civil Action No. 2:22-cv-247-MJH
Judge Horan

MICHAEL RUSSIN, et al.,

Defendant.

JURY TRIAL DEMANDED

AFFIDAVIT OF MATTHEW MAMROS

I, Matthew Mamros, hereby state the following:

1. I am a former insurance agent for American Income Life Insurance Company and Arias Agencies.
2. I worked with Plaintiff, Renee Zinsky, and Defendant, Michael Russin.
3. I have firsthand knowledge of facts relevant to this matter.
4. On or about March 8, 2023, Defendant Russin threatened me via Instagram messenger stating as follows:

Are you prepared for violence?

...

All this time you spend at 2am sending emails – do you ever think of the safety of your children?

...

Oh no wait this isn't the old hag

...

This is the young liar

I declare under penalty of perjury that the following is true and correct.

Date: 05/02/2023

Matthew Mamros

Matthew Mamros

VIRGINIA ACKNOWLEDGMENT

State of Virginia _____)
 County of Roanoke _____)
 _____)

On 05/02/2023 before me, Alexander Luis Marin,
 Date _____ Notary Name _____

personally appeared _____ Matthew Mamros
 _____ Name(s) of Signer(s)

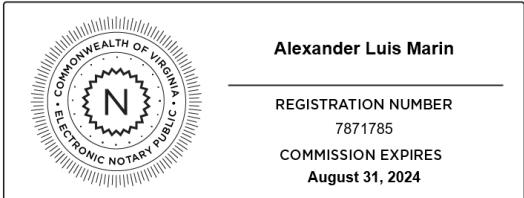
personally known to me -- OR --

proved to me on the basis of the oath of _____ -- OR --

proved to me on the basis of satisfactory evidence: _____ Driver License
 _____ Type of ID Presented

to be the individual(s) whose name(s) is (are) subscribed to the within instrument, and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies) and by proper authority, and that by his/her/their signature(s) on the instrument, the individual(s), or the person(s) or entity upon behalf of which the individual(s) acted, executed the instrument for the purposes and consideration therein stated.

WITNESS my hand and official seal.



Notary Public Signature: Alexander Luis Marin

Notary Commission Number: 7871785

Notary Commission Expires: 08/31/2024

Notarized online using audio-video communication

DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: AFFIDAVIT OF MATTHEW MAMROS

Document Date: 05/02/2023 Number of Pages (w/ certificate): 2

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: Matthew Mamros

- Corporate Officer Title: _____
- Partner – Limited General
- Individual Attorney in Fact
- Trustee Guardian of Conservator
- Other: _____

Signer Is Representing: _____
Matthew Mamros

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

- Corporate Officer Title: _____
- Partner – Limited General
- Individual Attorney in Fact
- Trustee Guardian of Conservator
- Other: _____

Signer Is Representing: _____

EXHIBIT “F”

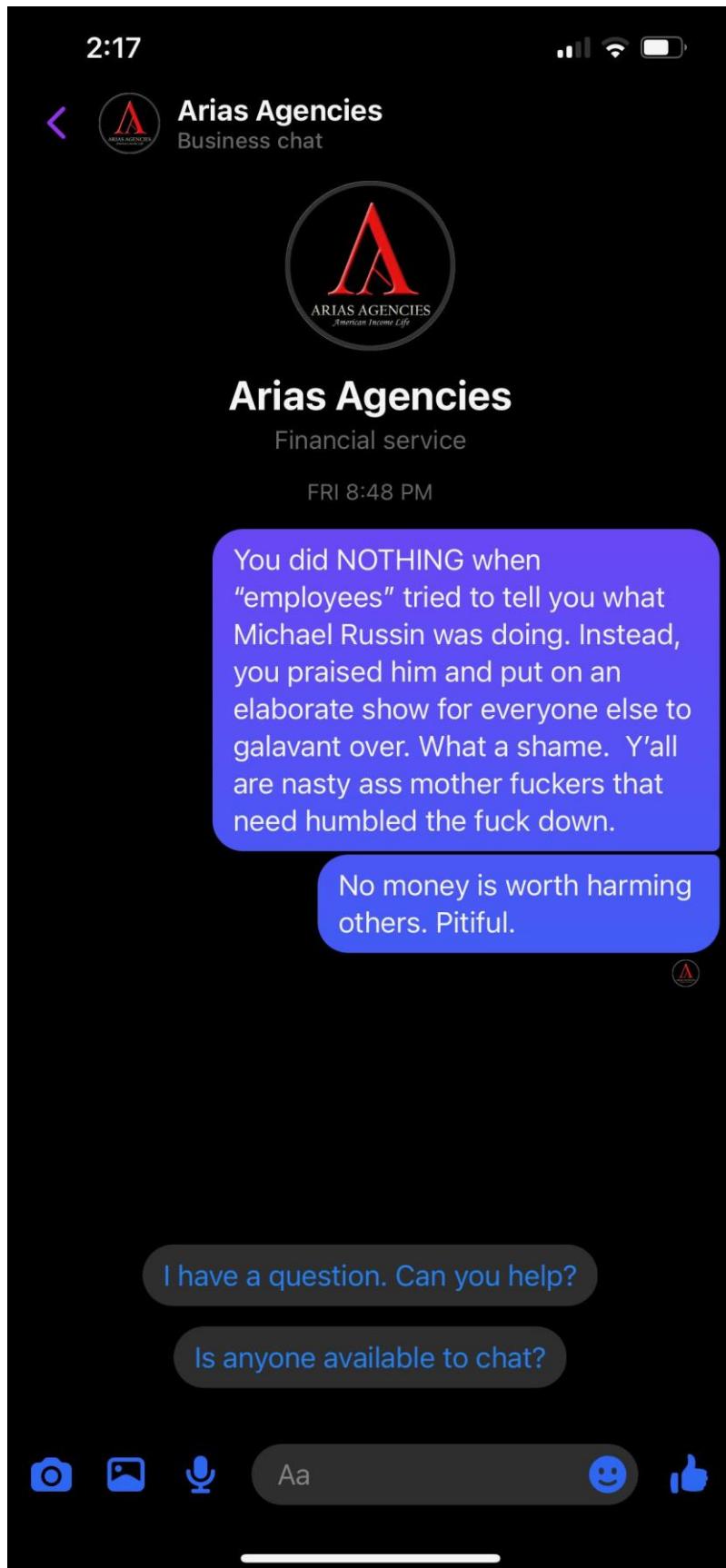


EXHIBIT "G"

Text Message
Today 6:34 PM

Hey! Is this Emily? :)

Hiiiiii yes, who's this??

Awe! You seem so nice for someone talking shit on social media about someone's kids! Can't wait to meet you!

You were offering your address up or something do you mind if we have that?

Lmao wtf 😂

Do you mind if we have your address so someone can hypothetically pay your and your balding boyfriend a visit?

get lost ✌️ it's a Sunday, I don't do drama, weirdo

Sorry *

I'm engaged lmao

Pay your FAT A\$\$

EXHIBIT "H"

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,
Plaintiff,
v.

Civil Action No. 2:22-cv-247-MJH
Judge Horan

MICHAEL RUSSIN, et al.,

Defendant.

JURY TRIAL DEMANDED

AFFIDAVIT OF EMILY GARRETT

I, Emily Garrett, hereby state the following:

1. I was employed by American Income Life Insurance Company (“AIL”) in the capacity of a sales agent from August 2018 to August 2019, approximately.
2. In my capacity as an AIL sales agent, I worked for Russin Financial and Arias Agencies.
3. In that capacity, I reported up to Michael Russin and Simon Arias.
4. Soon after I signed my agent contract and began working for AIL, I discovered that AIL controlled all aspects of my work including but not limited to my schedule, hours, and manner in which I performed my work as a sales agent on behalf of AIL.
5. In my capacity as a sales agent for AIL, I worked in a highly toxic, misogynistic, and often violent working environment as an AIL sales agent.
6. For example, I quickly discovered that there were zero females in management or leadership positions at AIL, Arias Agencies, and/or Russin Financial.
7. For example, I witnessed unwelcomed sexual comments and unwelcomed sexual contact from AIL’s male leaders such as Michael Russin toward subordinate female agents on a frequent basis.
8. On multiple occasions, Michael Russin sent me sexual, lewd, and offensive messages while working in his capacity as my supervisor and a leader on behalf of American Income Life Insurance Company, Arias Agencies, and Russin Financial.

9. Michael Russin would typically refer to females as “sluts”, “whores”, and “bitches”.
10. AIL’s top leaders such as Simon Arias knowingly maintained a toxic workplace by rewarding and encouraging male leaders such as Michael Russin in light of their openly offensive conduct such as sexual harassment, sexual assault, and fraud.
11. Male leaders such as Simon Arias and Michael Russin threatened subordinate agents against retaining legal counsel and/or otherwise attempting to speak up and/or report their misconduct.
12. On or about May 2023, I spoke up publicly about the toxic work environment that I experienced while working for AIL, Arias Agencies, and Russin Financial.
13. Approximately one week later, I received violent threats which I believe were sent, caused, or otherwise directed by Michael Russin.

I declare under penalty of perjury that the following is true and correct.

Date: 6/1/2023


Emily Garrett

State of Texas, Williamson County

Signed on 06/01/2023 by Emily Elizabeth Garrett

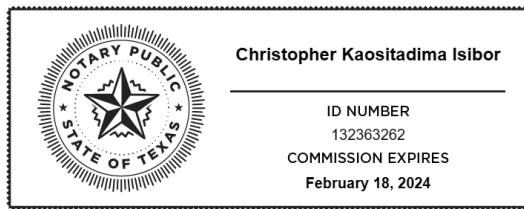

Notary Public, State of Texas

EXHIBIT "I"



AMY N. WILLIAMSON
ATTORNEY AT LAW

June 11, 2023

Benjamin D. Webb, Esq.
Cozza Law Group PLLC
4000 Holiday Drive, Suite 210
Pittsburgh, PA 15220
bwebb@cozzalaw.com

SENT VIA EMAIL

Re: *Zinksy v. Russin et al.*
No. 2:22-cv-547
Plaintiff's Fourth Supplemental Discovery Responses

Dear Mr. Webb,

Please allow this correspondence to supplement Plaintiff's discovery responses in the above referenced matter.

Plaintiff's Fourth Supplemental Answer to Defendant Russin's Interrogatory No. 2:

In addition to the witnesses previously identified in Plaintiff's Initial Disclosures and discovery responses, Plaintiff identifies the following 51 witness who have knowledge of facts relevant to Plaintiff's claims pending against Defendant Russin. (The witnesses with an * indicates that they are clients of Williamson Law LLC.) More specifically, the additional witnesses are as follows:

1. Kailey Andrasko*	27. Michael Manna
2. Ky Andrew	28. Sophia Menelle *
3. Erin Antoncic*	29. Brooke Miller
4. Jeanine Barlettano*	30. Genna Miller
5. Michael Barlettano*	31. Jordan Miller*
6. Dominic Bertini	32. Jocelyn Morose*
7. Janeen Bonnay*	33. Ashley Morton*
8. Tiffany Brianna	34. Ted Mrkonja
9. Sarah Bunting*	35. Jean Novak
10. Anna Carley	36. Ryan Ohm
11. Bernadette Casciato	37. Ryleigh Palmer*
12. Joseph Crivelli	38. Ryan Parrish
13. Christa Davis*	39. Peter Reichert
14. Scott Dehning*	40. Calene Rogers*
15. Tristan Dlabik	41. Alyssa Sadler
16. Matt Ficarra*	42. Ashley Seddon
17. Emily Garrett*	43. Suna Shaw

18. Lee Ann Heffley*	44. Linette Silverthorne
19. Chatiqua Hemingway*	45. David Strassburger
20. Brittany Ketner	46. Katie Thompson
21. Michelle Kruse	47. Laura Toney
22. Gabrielle Kolar*	48. Tyler Turner
23. Erica Laughlin	49. Alyssa Weston
24. Corey Lemos*	50. Susan Antilla
25. Tyler Lindquist*	51. Emily Cook*
26. Morgan Luptak	

Plaintiff's Fourth Supplemental Response to Defendant Russin's Request For Production No. 2:

Plaintiff produces 23 additional video recordings via Google Drive relevant to Plaintiff's claims against Defendant Russin. The link to access those files is as follows:

https://drive.google.com/drive/folders/1Zq2MQZxXU3OtBcmsBQwWegL5VUITOZA1?usp=drive_link

Specifically, those 23 video recordings are identified as follows:

1. 64k Per Week	13. Dlabik Culture Chant
2. AIL Cancun 2023	14. Dlabik Dissect Your Personal Life
3. Arias Boxing Gloves	16. Dlabik It Will Cost You Everything
4. Jackson 74k Month	17. Dlabik There's No Reason
5. Arias Not a Job a Lifestyle	18. Dr. Parrish
6. Arias The Edge	19. Globe Life Legacy Award 2022
7. Arias Workout	20. Jackson Dlabik Celebration
8. Cornhole Agency Meeting	21. Job Description
9. Dlabik Be a Lion	22. Nemacolin Arias Executive Counsel 2022
10. Dlabik Be a Patriarch	23. You Not a Man?
11. Dlabik Blue Collar	
12. Dlabik Bribing College Dropouts	
13. Dlabik Cause I Failed	

In addition, Plaintiff identifies all Absideon Achievement podcast episodes and other social media content as published by Defendant Russin to date and ongoing, as well as 11 additional video recordings and documents located at the below referenced website links:

1. Business Insider, *Inside The Tawdry, Drug-fueled, Violent World of America's Top Life Insurance Salesman*, February 24, 2023
<https://www.insider.com/globe-life-insurance-lawsuit-american-income-arias-agency-toxic-workplace-2023-1>
2. Business Insider, *Globe Life Fallout After Allegations of Sexual Assault*, March 10, 2023
<https://www.insider.com/globe-life-fallout-after-allegations-of-sexual-assault-arias-agency-2023-3>
3. Businesswire, *Investigation Alert: Scott + Scott Attorneys at Law LLP Investigates Globe Life Inc.'s Directors and Officers for Breach of Fiduciary Duties – GL*, February 23, 2023
<https://www.businesswire.com/news/home/20230227005945/en/INVESTIGATION-ALERT-Scott+Scott-Attorneys-at-Law-LLP-Investigates-Globe-Life-Inc.%E2%80%99s-Directors-and-Officers-for-Breach-of-Fiduciary-Duties-%E2%80%93-GL>
4. Carey & Associates, P.C., *The Worst Sexual Harassment Case Ever!*, March 10, 2023
<https://capclaw.com/the-worst-sexual-harassment-story-ever/>

5. Globe News Wire, *GL Alert: Johnson Fistel is Investigating Potential Claims on Behalf of Globe Life Inc.*, March 2, 2023
<https://www.globenewswire.com/news-release/2023/03/02/2619654/0/en/GL-Alert-Johnson-Fistel-is-Investigating-Potential-Claims-on-Behalf-of-Globe-Life-Inc.html>
6. Insurance Newsnet, *Author: Financial Services Often “A Barbaric Culture” That Worships Money*, March 3, 2023
<https://insurancenewsnet.com/innarticle/author-financial-services-often-a-barbaric-culture-that-worships-money>
7. OpenPR, *Investigation Announced for Investors in Shares of Globe Life Inc. (NYSE: GL)*, March 7, 2023
<https://www.openpr.com/news/2963434/investigation-announced-for-investors-in-shares-of-globe-life#:~:text=An%20investigation%20was%20announced%20over%20potential%20securities%20laws.mail%40shareholdersfoundation.com%20or%20call%20B1%20%28858%29%20779%20-%201554.>
8. Stanford Law School, *Lawsuit Against American Income Life Alleges Sex Abuse, Hard Drugs, Fraud at Top Agency*, February 28, 2023
<https://law.stanford.edu/press/lawsuit-against-american-income-life-alleges-sex-abuse-hard-drugs-fraud-at-top-agency/>
9. WPXI, *Federal Lawsuit Filed Against Wexford Life Insurance Company*, June 1, 2023
<https://www.wpxi.com/news/local/federal-lawsuit-filed-against-wexford-life-insurance-company/E7VLBV53LZF67FWJ6D2BLK5IQ4/#:~:text=Channel%2011%20also%20reached%20out%20to%20its%20parent,aware%20of%20any%20criminal%20investigations%20against%20the%20company>
10. WTAE, *Lawsuit Alleges Fraud, Sexual Abuse and Illicit Drugs at Wexford Insurance Agency*
<https://www.wtae.com/article/arias-agencies-wexford-insurance-allegations-drugs-sexual-abuse/43980886>
11. Yahoo News, *Federal Lawsuit Alleging Sexual Assault, Drug Use Filed Against Wexford Life Insurance Company*, June 1, 2023
<https://news.yahoo.com/federal-lawsuit-filed-against-wexford-213419791.html>

Finally, please see additional documents labelled as [ZINSKY001793 - ZINSKY002237] produced at the Google Drive link noted above. Please let me know if you have any issues accessing same.

Sincerely,

/s/Amy N. Williamson, Esq.

EXHIBIT "J"



+1 (814) 208-9636 >

Hey Em! You don't know me but I know one of your family members really well that's all I can say.

I work at a district court and if I were you I'd get a lawyer immediately. There is a big lawsuit coming down with your name and a few others on it. You're going to get a litigation hold which means you need to preserve everything. It looks like it's for a couple million dollars and defamation I didn't catch the name of the person filing it I just saw your name in passing.

I'd get a lawyer asap or maybe you already know this and this was a waste.

EXHIBIT "K"



+1 (207) 881-1751 >

Today 6:24 PM

Hello! Is this Emily Garrett?

I don't answer strange numbers and I don't expect you to! My name is Shawn Marshuck from the Maine Daily Wire! I was reaching out to see if I could get your comment on a pending lawsuit in which you are a named defendant! I tried finding the Facebook post that I was forwarded regarding the suit- but couldn't find it. Would you be open to a phone interview? If not- do you have a lawyer that would care to make a comment?

The sender is not in your contact list.

[Report Junk](#)

EXHIBIT "L"

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,
Plaintiff,
v.

Civil Action No. 2:22-cv-247-MJH
Judge Horan

MICHAEL RUSSIN, et al.,

Defendant.

JURY TRIAL DEMANDED

AFFIDAVIT OF CHATIQUA HEMINGWAY

I, Chatiqua Hemingway, hereby state the following:

1. I am a professional female boxer.
2. I live and work in the Pittsburgh, Pennsylvania area.
3. Between 2020 and March 2023, I was a member of the Board of Directors for a charity known as Steel City Impact (“SCI”).
4. Between August 2020 and March 2023, I worked for Simon Arias (“Arias”) as a personal trainer.
5. In my capacity as a board member for SCI and trainer for Arias, I worked closely with Arias in Arias Agencies and American Income Life Insurance Company (“AIL”) office located in Wexford, Pennsylvania (“Wexford Office”).
6. Between August 2020 and March 2023, I was in the Wexford Office multiple times per week.
7. Between August 2020 and March 2023, I also spent a lot of time with Arias outside of the office.
8. Between August 2020 and March 2023, I had a close personal and professional relational relationship with Simon Arias.
9. From August 2020 to March 2023, I developed relationships with Arias’ co-workers, Arias’ friends, and Arias’ family members.
10. I witnessed Arias and other male leaders such as Michael Russin (“Russin”) on behalf of AIL in countless work meetings, calls and other events both at the Wexford Office and at other work-related events.
11. I have firsthand knowledge of a misogynistic, sexist, and toxic workplace culture at AIL and Arias Agencies which was driven by the AIL male leaders such as Arias and Russin.

12. For example, AIL leaders such as Arias and Russin often made demeaning, sexist, perverted, offensive, and often angry comments to and about females both in the AIL workplace and otherwise.
13. For example, Arias would refuse to hire or promote females for reasons such “they talk too much” or “ask too many questions”.
14. The toxic workplace culture at Arias Agencies was also driven by Arias’ focus on grooming and recruiting minors on behalf of AIL, Arias Agencies, and SCI.
15. Arias would often lie, mislead, and manipulate minors to his personal and professional benefit.
16. Arias asked me to help him recruit minors. Specifically, Arias said he was looking for “cute young girls”, “good looking popular girls”, and asked me where he could find the “cutest young black girls in Pittsburgh.”
17. I have firsthand knowledge of Arias engaging in inappropriate sexual conversations and conduct with minors as young as 12 and 13 years old.
18. I voiced my concerns about Arias’ inappropriate conduct with minors to other SCI Board members and refused to help Arias recruit minors on behalf of SCI.
19. When Arias learned that I voiced concerns about his inappropriate conduct, Arias offered me \$10,000.00 to step down from the SCI Board of Directors, which I refused.
20. After I refused Arias’ bribe, Arias retaliated against me by removing me from the SCI Board of Directors.
21. After I refused Arias’ bribe, Arias retained legal counsel (Strassburger, McKenna, Gutnik & Gefsky) in an attempt to intimidate, threaten and silence me from speaking the truth.
22. I have firsthand knowledge of AIL’s male leaders, including but not limited to Arias and Russin, engaging in intimidation tactics, threats, and violence in their capacity as AIL representatives.
23. I have firsthand knowledge of AIL’s male leaders, including but not limited to, Arias and Russin taking steroids and other illegal drugs in the office and/or at AIL work related events.

I declare under penalty of perjury that the following is true and correct.

Date: 05/17/2023



Chatiqua Hemmingway

State/Commonwealth of TEXAS)
 City County of Collin)

On 05/17/2023, before me, Monica Marie Hall,
Date Notary Name

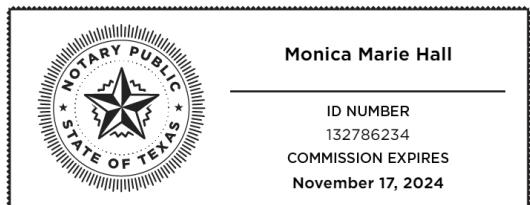
the foregoing instrument was subscribed and sworn (or affirmed) before me by:

Chatiqua Hemingway

Name of Affiant(s)

Personally known to me -- OR --
 Proved to me on the basis of the oath of _____ -- OR --
 Proved to me on the basis of satisfactory evidence: _____

Name of Credible Witness _____
Type of ID Presented _____
driver_license



WITNESS my hand and official seal.

Notary Public Signature:

Notary Name: Monica Marie Hall Notary Public, State of Texas

Notary Commission Number: 132786234

Notary Commission Expires: 11/17/2024

Notarized online using audio-video communication

DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: Affidavit for Chatiqua Hemingway

Document Date: 05/17/2023

Number of Pages (including notarial certificate): 3